

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HANNA BOUVENG,

Plaintiff,

v.

NYG CAPITAL LLC d/b/a NEW YORK GLOBAL
GROUP, FNL MEDIA LLC, and BENJAMIN WEY

Defendants.

14-cv-5474 (PGG)

**STIPULATION AND
CONSENT ORDER WITH
PERMANENT INJUNCTION**

NYG CAPITAL LLC and BENJAMIN WEY,

Counterclaim Plaintiffs,

v.

HANNA BOUVENG,

Counterclaim Defendant.

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 6/17/18
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NYG CAPITAL LLC and BENJAMIN WEY,

Third-Party Plaintiffs,

v.

THE MORELLI LAW FIRM PLLC, MORELLI
ALTERS RATNER, MORELLI RATNER LAW
FIRM, PLLC, MORELLI RATNER, P.C., MORELLI
ALTERS RATNER P.C., MORELLI ALTERS
RATNER LLP, and MORELLI LAW FIRM, PLLC,

Thurd-Party Defendants.

WHEREAS, all parties have agreed to resolve this action and have agreed to the entry of this Stipulation and Consent Order with Permanent Injunction:

NOW, THEREFORE, Plaintiff Hanna Bouveng ("Plaintiff" or "Counterclaim Defendant"), Defendants NYG Capital LLC d/b/a New York Global Group, FNL Media LLC and Benjamin Wey ("Defendants" or "NYG Parties" or "Counterclaim Plaintiffs"), and Third-Party Defendants

The Morelli Law Firm PLLC, Morelli Alters Ratner, Morelli Ratner Law Firm, PLLC, Morelli Ratner, P.C., Morelli Alters Ratner P.C., Morelli Alters Ratner LLP, and Morelli Law Firm, PLLC (collectively the "Morelli Firm" or "Third-Party Defendants"), (Plaintiff, Defendants, and the Morelli Firm may be referred to individually as a "Party" and collectively as the "Parties"), hereby stipulate, pursuant to Federal Rule of Civil Procedure 41(a)(2), as follows:

1. Plaintiff Hanna Bouveng voluntarily withdraws and dismisses with prejudice (and without costs, fees or expenses to any party) all claims asserted in this action.

2. The NYG Parties voluntarily withdraw and dismiss with prejudice (and without costs, fees, or expenses to any party) all claims asserted in this action including, without limitation, all counterclaims and all third-party claims asserted against the Third-Party Defendants (Dkt. No. 372).

3. The Judgment (Dkt. No. 249) and Amended Judgment (Dkt. No. 312) are hereby vacated, and shall be null and void and of no force or effect.

4. The Parties are hereby permanently enjoined as follows: The Parties shall never publish, post, republish or repost, nor cause, permit or encourage anyone else under their control to publish, post, republish or repost, anything of any kind, accurate or not, of, about, regarding or concerning the other Parties (including without limitation of, about, regarding or concerning any member of the Parties' family) in any medium of any kind. For purposes of this Stipulation and Consent Order with Permanent Injunction, the Parties are further permanently enjoined from making or causing any such publications or postings about (i) Benedict Morelli and his family; and (ii) any current lawyers of the Morelli Firm. The Court shall retain jurisdiction over the Parties to enforce this Stipulation and Consent Order with Permanent Injunction.

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5. A violation of the foregoing injunction shall subject the breaching Party to contempt of Court, and all other remedies available at law and in equity to the non-breaching Party or Parties. Nothing in this Stipulation and Consent Order with Permanent Injunction shall limit the rights and remedies of the non-breaching Party in any way.

CATAFAGO FINI LLP

/s/ Tom M. Fini

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MORELLI LAW FIRM, PLLC

/s/ Benedict P. Morelli

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Counsel for Plaintiff

Dated: New York, New York
June 12, 2018

The Clerk of Court is directed to close this case.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe
United States District Judge

June 13, 2018